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**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF NEW YORK**

Dr. FREDERICK K. C. PRICE, an individual,

Plaintiff,

v.

JOHN STOSSEL, an individual, GLENN  
RUPPEL, an individual, AMERICAN  
BROADCASTING COMPANIES, INC., a  
Delaware corporation, ABC INC., a Delaware  
corporation, OLE ANTHONY, an individual,  
TRINITY FOUNDATION, INC., an entity,  
form unknown,  
Defendants.

Civil Action No. 07-CV-11364 (SWK) (THK)

The Honorable Shirley Wohl Kram

SUPPLEMENTAL DECLARATION OF  
DAVID E. FINK IN SUPPORT OF THE  
MOTION OF DEFENDANTS JOHN  
STOSSEL, GLENN RUPPEL, AMERICAN  
BROADCASTING COMPANIES, INC. AND  
ABC, INC. TO TRANSFER VENUE  
PURSUANT TO 28 U.S.C. § 1404(a)

**ORAL ARGUMENT REQUESTED**

**DECLARATION OF DAVID E. FINK**

I, David E. Fink, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner of White O'Connor Fink & Brenner LLP (the "Firm"), attorneys of record for Defendants John Stossel, Glenn Ruppel, American Broadcasting Companies, Inc., and ABC, Inc. (collectively, "ABC"). I have personal knowledge of the facts set forth herein, except as to those stated on

information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

2. On March 26, 2008, ABC filed a motion to transfer the above-captioned action from the United States District Court for the Southern District of New York (the “Southern District”) back to the United States District Court for the Central District of California (the “Central District”), which district is located in Los Angeles County. In support of ABC’s opening and reply briefs, I and my colleague, Allison Rohrer, submitted declarations.<sup>1</sup>

3. On May 12, 2008, the Court ordered that ABC submit a supplemental declaration “containing factual statements pertinent to [ABC’s] motion to transfer.” Pursuant to the Order of the Court, I have set forth below relevant factual information and have grouped that information by the factors applicable on a motion to transfer pursuant to 28 U.S.C. § 1404. Should the Court require any additional information, I will gladly provide any such information.

**The Parties’ Convenience Supports Transfer To The Central District**

4. Plaintiff Frederick K.C. Price (“Price”) is a long-time California resident, he originally brought this action in Los Angeles Superior Court, and he proceeded to litigate this action in the Central District. See Fink Decl. ¶ 22 Ex. 14 (Price’s Complaint filed in this action (hereinafter the “NY Compl.”) ¶¶ 9, 19-20) (describing Price’s upbringing in Los Angeles and the founding of his church in Inglewood, California); Fink Decl. ¶ 12 Ex. 9 (Price’s original Complaint, filed in Los Angeles County Superior Court (hereinafter the “CA Compl.”) ¶¶ 8, 18-19) (same). Price’s Crenshaw Christian Center Church of Los Angeles County (“Crenshaw-Los Angeles Church”) also is located in Los Angeles County. CA Compl. ¶¶ 1, 19; *see also* Fink

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<sup>1</sup> The contents of my declaration and Ms. Rohrer’s declaration are incorporated herein. In the interest of efficiency, I have not duplicated their contents or the exhibits attached thereto. My original declaration is cited herein as “Fink Decl.”

Decl. ¶ 13 Ex. 21 (California Secretary of State Business Record) (church has been California corporation since 1973); ¶ 29 Ex. 19 (webpage re: history of Crenshaw-Los Angeles Church). Moreover, the offices of Price's lead trial counsel, Anthony Glassman, are located in Los Angeles County, and Price's expert on "linguistics" appears to reside in California. *See* Declaration of Edward Finegan in Supp. of Opp. to Defs.' Mot. Transfer.

5. ABC, and Defendants Ole Anthony, and Trinity Foundation, Inc. (collectively, "Trinity") already appeared in the Central District, and proceeded to litigate this action in the Central District. Moreover, all of ABC's party witnesses will appear for trial in California (including, Glenn Ruppel, John Stossel, Pat Dauer, Nicole Gallagher, Rene Hall Gonen, Iman Hobbs, Ruth Iwano, Martin Phillips, David Sloane, and Theresa Karle, to the extent their testimony is necessary); *see also* Fink Decl. ¶ 26. The majority of non-party witnesses from whom ABC intends to elicit testimony work and/or reside in Los Angeles County. *See infra* ¶¶ 6-8. All of ABC's evidence that is relevant to this action has been transported to California, where it remains today. *Id.* ¶ 13. Finally, the offices of ABC's and Trinity's lead counsel are located in the Central District of California.

#### **The Central District Is More Convenient For ABC's Material Non-Party Witnesses**

6. ABC intends to elicit testimony from numerous non-party witnesses in order to establish that the News Report was true and caused no harm to Price. Since the parties have not conducted formal discovery, ABC cannot yet identify some of the witnesses. With respect to identified witnesses, I understand that they all work and/or reside in Los Angeles County, as illustrated below.

- Betty Price. The website for Price's Crenshaw-Los Angeles Church states that Mrs. Betty Price (also known as "Dr. Betty") is Price's wife and that she "plays a vital role in her husband's ministry, as well as in the operation of the church." Fink Decl. ¶ 27 Ex. 17 (webpage

from <http://www.crenshawchristiancenter.net> regarding (“CCC.net”) regarding Mrs. Price). Mrs. Price and her husband both travel and minister around the world; in addition, Mrs. Price has been in charge of establishing numerous programs at the Crenshaw-Los Angeles Church. *Id.* On information and belief, Mrs. Price can provide testimony regarding Price’s wealth and his boasting about material possessions, lack of any harm to Price, and the fiscal transparency of Price’s church. Real property tax assessor records identify Mrs. Price as owner (along with Price) of a home in Palos Verdes Estates, California. Fink Decl. ¶ 34 Ex. 24. Since Mrs. Price is involved with the Crenshaw-Los Angeles Church, is married to Price, and appears to own a home in Los Angeles County, it is fair to assume that Mrs. Price works and/or resides in Los Angeles County. *See* Fink Decl. ¶ 27 Ex. 17 (stating Mrs. Price moved to Los Angeles in 1943 and that Mrs. Price recently won an award from the Los Angeles County Commission for Women).

- Angela Evans. The website for Price’s Crenshaw-Los Angeles Church identifies Angela Evans as the President of Crenshaw Christian Center, Inc. Fink Decl. ¶ 28 Ex. 18 (webpage from CCC.net regarding Angela Evans). The website states, “As president of a \$40 million corporation [Mrs. Evans] heads a staff of over 200 employees working in 14 divisions of operation”; in addition, the websites states that she “is responsible for the operation of a 22,000 member church, four schools, and chairs a variety of community development organizations.” *Id.*; *see also id.* ¶ 30 Ex. 20 (Grant McLaren, *Matching Mission and Machine*, Professional Pilot Magazine, Nov. 2005, at 91, 92) (stating Crenshaw-Los Angeles Church’s “Pres [is] Angela Evans”). On information and belief, Mrs. Evans can provide testimony regarding Price’s wealth and his boasting about material possessions, lack of any harm to Price, the financial operations of Price’s church, and the fiscal transparency of Price’s church. According to records of the California Secretary of State and real property tax assessor, Mrs. Evans’ address is listed in Los

Angeles County. Rohrer Decl. Ex. 1 (California Secretary of State Business Record – Statement of Information) (stating Mrs. Evans is the agent for service of process for Crenshaw-Los Angeles Church and listing a Los Angeles address for service of process); Fink Decl. ¶ 31 Ex. 21 (webpage from California Secretary of State) (stating same), ¶ 37 Ex. 27 (real property tax assessor record) (listing Los Angeles, California address), ¶ 28 Ex. 18 (describing Mrs. Evans’ upbringing in Los Angeles). Accordingly, it is fair to assume that Ms. Evans works and/or resides in Los Angeles County.

- A. Michael Evans. The website for Price’s Crenshaw-Los Angeles Church identifies A. Michael Evans as Angela Evans’ husband and an employee of Price’s church. Fink Decl. ¶ 28 Ex. 18 (webpage from CCC.net regarding Angela Evans) (stating Angela Evans married A. Michael Evans, Jr. in 1976); *see also id.* ¶ 27 Ex. 17 (webpage from CCC.net regarding Dr. Betty Price) (“All of the Price children and their sons and daughter-in-law (A. Michael Evans Jr., Danon Buchanan and Angel Chavon Price) work for the Ministry at Crenshaw Christian Center in Los Angeles.”); *see also id.* ¶ 30 Ex. 20 (Grant McLaren, *Matching Mission and Machine*, Professional Pilot Magazine, Nov. 2005, at 91, 92) (stating Crenshaw-Los Angeles Church’s “VP of Marketing [is] Michael Evans Jr.” and that Mr. Evans also serves as the director of flight operations). On information and belief, Mr. Evans can provide testimony regarding Price’s wealth and his boasting about material possessions, lack of any harm to Price, and the fiscal transparency of Price’s church. Real property tax assessor records identify Mr. Evans (and Angela Evans) as owners of a home in Los Angeles, California. Fink Decl. ¶ 37 Ex. 27. Since Mr. Evans is involved with the Crenshaw-Los Angeles Church and the church is located in Los Angeles County, he is married to Angela Evans, and he appears to own a home in Los Angeles County, it is fair to assume that Mr. Evans works and/or resides in Los Angeles County. *See* Fink Decl. ¶ 28 Ex. 18.

- Cheryl Price. The website for Price's Crenshaw-Los Angeles Church identifies Cheryl Price as Price's daughter and an employee of Price's church. Fink Decl. ¶ 27 Ex. 17 (webpage from CCC.net regarding Dr. Betty Price) ("Drs. Fred and Betty Price have four children – Angela Marie Evans, Cheryl Ann Price, Stephanie Pauline Buchanan, and Frederick Kenneth Price, Jr. All of the Price children . . . work for the Ministry at Crenshaw Christian Center in Los Angeles."). On information and belief, Cheryl Price can provide testimony regarding Price's wealth and his boasting about material possessions, lack of any harm to Price, and the fiscal transparency of Price's church. Since Cheryl Price is involved with the Crenshaw-Los Angeles Church and the church is located in Los Angeles County, it is fair to assume that Cheryl Price works and/or resides in Los Angeles County.

- Stephanie Buchanan. The website for Price's Crenshaw-Los Angeles Church identifies Stephanie Buchanan as Price's daughter and an employee of Price's church. Fink Decl. ¶ 27 Ex. 17 (webpage from CCC.net regarding Dr. Betty Price) ("Drs. Fred and Betty Price have four children – Angela Marie Evans, Cheryl Ann Price, Stephanie Pauline Buchanan, and Frederick Kenneth Price, Jr. All of the Price children . . . work for the Ministry at Crenshaw Christian Center in Los Angeles."). On information and belief, Ms. Buchanan can provide testimony regarding Price's wealth and his boasting about material possessions, lack of any harm to Price, and the fiscal transparency of Price's church. A real property transaction record identifies Ms. Buchanan (and her husband Danon Buchanan) as owners of a home in Harbor City, California (which is in or near Los Angeles County). A true and correct copy of this record is attached hereto as Exhibit 1. Since Ms. Buchanan is involved with the Crenshaw-Los Angeles Church and the church is located in Los Angeles County and she appears to own a home in or near Los Angeles County, it is fair to assume that Ms. Buchanan works and/or resides in Los Angeles County.

- Danon Buchanan. The website for Price's Crenshaw-Los Angeles Church identifies Danon Buchanan as Price's son-in-law and an employee of Price's church. Fink Decl. ¶ 27 Ex. 17 (webpage from CCC.net regarding Dr. Betty Price) ("All of the Price children and their sons and daughter-in-law (A. Michael Evans Jr., Danon Buchanan and Angel Chavon Price) work for the Ministry at Crenshaw Christian Center in Los Angeles."). On information and belief, Mr. Buchanan can provide testimony regarding Price's wealth and his boasting about material possessions, lack of any harm to Price, and the fiscal transparency of Price's church. A real property transaction record identifies Mr. Buchanan (and his wife Stephanie Buchanan) as owners of a home in Harbor City, California (which is in or near Los Angeles County). A true and correct copy of this record is attached hereto as Exhibit 1. Since Mr. Buchanan is involved with the Crenshaw-Los Angeles Church and the church is located in Los Angeles County and he appears to own a home in or near Los Angeles County, it is fair to assume that Mr. Buchanan works and/or resides in Los Angeles County.

- Frederick Price, Jr. The website for Price's Crenshaw-Los Angeles Church identifies Frederick Price, Jr. as Price's son and an employee of Price's church ("Mr. Price, Jr."). Fink Decl. ¶ 27 Ex. 17 (webpage from CCC.net regarding Dr. Betty Price) ("Drs. Fred and Betty Price have four children – Angela Marie Evans, Cheryl Ann Price, Stephanie Pauline Buchanan, and Frederick Kenneth Price, Jr. All of the Price children . . . work for the Ministry at Crenshaw Christian Center in Los Angeles.") (emphasis added). On information and belief, Mr. Price Jr. can provide testimony regarding Price's wealth and his boasting about material possessions, lack of any harm to Price, and the fiscal transparency of Price's church. Since Mr. Price Jr. is involved with the Crenshaw-Los Angeles Church and the church is located in Los Angeles County, it is fair to assume that Mr. Price Jr. works and/or resides in Los Angeles County.

- Angel Price. The website for Price's Crenshaw-Los Angeles Church identifies Angel Price as Price's daughter-in-law and an employee of Price's church. Fink Decl. ¶ 27 Ex. 17 (webpage from CCC.net regarding Dr. Betty Price) ("All of the Price children and their sons and daughter-in-law (A. Michael Evans Jr., Danon Buchanan and Angel Chavon Price) work for the Ministry at Crenshaw Christian Center in Los Angeles."). On information and belief, Angel Price can provide testimony regarding Price's wealth and his boasting about material possessions, lack of any harm to Price, and the fiscal transparency of Price's church. Since Angel Price is involved with the Crenshaw-Los Angeles Church and the church is located in Los Angeles County, it is fair to assume that Angel Price works and/or resides in Los Angeles County.

- Non-Price Family Members of the Board of Directors of the Crenshaw-Los Angeles Church. Price alleges that "[t]he Board [of Directors] control[s] [his church's] finances," and "set[s] and approve[s] his salary." CA Compl. ¶ 22; NY Compl. ¶ 25. On information and belief, members of the Board can provide testimony regarding the financial records and fiscal transparency of Price's church, Price's church salary and non-salary perks, and the lack of any economic or reputational harm. The Board can also provide information about wealth diverted to other Price family members. Since the Crenshaw-Los Angeles Church is located in Los Angeles County, it is fair to assume that at least some members of the Board of Directors reside and/or work in Los Angeles County.

- Non-Price Family Officers of the Crenshaw-Los Angeles Church. According to records of the California Secretary of State, officers of Price's church include (a) Janette Fant, Secretary; and (b) Ronald K. Jones, Chief Financial Officer. *See* Rohrer Decl. ¶ 2 Ex. 1 (California Secretary of State Business Record – Statement of Information). On information and belief, officers of Price's church can provide testimony regarding the financial records and fiscal



transparency of Price's church, Price's church salary and non-salary perks, and the lack of any economic or reputational harm. Officers of Price's church can also provide information about wealth diverted to other Price family members. In a filing with the California Secretary of State, the addresses provided for Ms. Fant and Mr. Jones were in Los Angeles County, and thus it is fair to assume that they reside and/or work in Los Angeles County. *See id.* In addition, since the Crenshaw-Los Angeles Church is located in Los Angeles County, it is fair to assume that other as-yet unidentified officers also reside and/or work in Los Angeles County.

- Price's Personal Accountant. Price possesses an abundance of wealth and the evidence of such wealth is located in, or within close proximity of, Los Angeles County. *See* Fink Decl. ¶ 30 Ex. 20 (Grant McLaren, *Matching Mission and Machine*, Professional Pilot Magazine, Nov. 2005, at 91) (stating the private Gulfstream jet used by Price is "based at LGB (Long Beach, CA)"); *id.* ¶¶ 34-37 Exs. 24-27 (real property tax assessor records for real property owned by Price or his family located in Los Angeles County); *id.* ¶¶ 32-33 Exs. 22-23 (California Secretary of State business record re: Fellowship of Inner City Word of Faith Ministries ("FICWFM")); Executive Affiliation Records for FICWFM) (indicating Price is the CEO of FICWFM, a California corporation located at the same address as Price's Crenshaw-Los Angeles Church, with the same agent of service of process, Angela Evans). In light of Price's affluence, and of his leadership positions in two California corporations (which are located at the same Los Angeles address), Price likely has a personal accountant who works and/or resides in or near Los Angeles County. On information and belief, Price's personal accountant can provide testimony regarding Price's wealth, church salary, other income (*e.g.* salary from FICWFM), and financial perks; Price's strategies for transferring his wealth to other family members; and lack of any economic harm. Price's personal accountant can also provide information about wealth diverted to other Price family members.

- Accountants For Price's Crenshaw-Los Angeles Church. Price alleges that the Crenshaw-Los Angeles Church's finances are "audited annually by a firm of certified public accountants." CA Compl. ¶ 22; NY Compl. ¶ 25. On information and belief, the accountants can provide testimony regarding Price's wealth, church salary, and non-salary perks; financial records and fiscal transparency of his church; and lack of any economic harm. Accountants for the church can also provide information about wealth diverted to other Price family members. Since the Crenshaw-Los Angeles Church is located in Los Angeles County, along with its Chief Financial Officer, Mr. Jones, and since the Crenshaw-Los Angeles Church is a California corporation, it is fair to assume that the accountants for the church reside and/or work in Los Angeles County.

- Person Most Knowledgeable For Price's Church. ABC will further seek testimony, under Rule 30(b)(6) of the Federal Rules of Civil Procedure, from a person or persons knowledgeable about Price's church and its finances. Price (erroneously) complains that the News Report accused him of "divert[ing] funds donated to [his Crenshaw-Los Angeles Church] for his own personal use." CA Compl. ¶ 22; NY Compl. 25. On information and belief, 30(b)(6) witnesses can provide testimony regarding Price's wealth, church salary, and non-salary perks; financial records and fiscal transparency of his church; and lack of any economic harm. Since the Crenshaw-Los Angeles Church is located in Los Angeles County, it is fair to assume that any 30(b)(6) witnesses for the church reside and/or work in Los Angeles County.

- Gail Dulay. Price's Rebuttal Video<sup>2</sup> includes an interview with Ms. Dulay and identifies her as a parishioner of his Crenshaw-Los Angeles Church. *See* Fink Decl. ¶ 10 Ex. 7.

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<sup>2</sup> As explained in ABC's opening brief, after the broadcast of the News Report, Price created and posted on his church's website a rebuttal video, which includes interviews with members of the Crenshaw-Los Angeles Church (the "Rebuttal Video"). Fink Decl. ¶ 10 Ex. 7 (CD-ROM: (footnote continued))

On information and belief, Ms. Dulay can provide testimony regarding Price's wealth, income, and perks; financial records and fiscal transparency of his church; and lack of any economic or reputational harm. Since the Crenshaw-Los Angeles Church is located in Los Angeles County, it is fair to assume that its parishioners, including Ms. Dulay, reside and/or work in Los Angeles County.

- Bernadine Buchanan. Price's Rebuttal Video includes an interview with Ms. Buchanan and identifies her as a parishioner of his Crenshaw-Los Angeles Church. *See* Fink Decl. ¶ 10 Ex. 7. On information and belief, Ms. Buchanan can provide testimony regarding Price's wealth, income, and perks; financial records and fiscal transparency of his church; and lack of any economic or reputational harm. Since the Crenshaw-Los Angeles Church is located in Los Angeles County, it is fair to assume that its parishioners, including Ms. Buchanan, reside and/or work in Los Angeles County.

- Ronn Whitaker. Price's Rebuttal Video includes an interview with Mr. Whitaker and identifies him as a parishioner of his Crenshaw-Los Angeles Church. *See* Fink Decl. ¶ 10 Ex. 7. On information and belief, Mr. Whitaker can provide testimony regarding Price's wealth, income, and perks; financial records and fiscal transparency of his church; and lack of any economic or reputational harm. Since the Crenshaw-Los Angeles Church is located in Los Angeles County, it is fair to assume that its parishioners, including Mr. Whitaker, reside and/or work in Los Angeles County.

- Loretta Cooper. Price's Rebuttal Video includes an interview with Ms. Cooper and identifies her as a parishioner of his Crenshaw-Los Angeles Church. *See* Fink Decl. ¶ 10 Ex. 7. On information and belief, Ms. Cooper can provide testimony regarding Price's wealth,

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Rebuttal Video); *see also id.* ¶ 11 Ex. 8 (webpage from <http://crenshawchristiancenter.net>).

income, and perks; financial records and fiscal transparency of his church; and lack of any economic or reputational harm. Since the Crenshaw-Los Angeles Church is located in Los Angeles County, it is fair to assume that its parishioners, including Ms. Cooper, reside and/or work in Los Angeles County.

- Other Member's Of Price's Crenshaw-Los Angeles Church. Price alleges that his Crenshaw-Los Angeles Church has a local congregation of over 22,000. CA Compl. ¶19. On information and belief, the members of Price's church can provide testimony regarding Price's wealth, income, and perks; financial records and fiscal transparency of his church; and lack of any economic or reputational harm. Since the Crenshaw-Los Angeles Church is located in Los Angeles County, it is fair to assume that its parishioners reside and/or work in Los Angeles County.

- Rick Handlin. In the November 2005 issue of *Professional Pilot Magazine*, Mr. Handlin was interviewed with respect to his role as the Chief Pilot of a private Gulfstream jet available to Price. See Fink Decl. ¶ 30 Ex. 20. On information and belief, Mr. Handlin can provide testimony regarding Price's non-salary perks (e.g., free travel). The magazine article states that Mr. Handlin resides two (2) hours from the Long Beach, California Airport. Id.

7. ABC further intends to elicit testimony from three (3) non-party witnesses who, on information and belief, do not reside in New York or California. These witnesses are Rusty Leonard (North Carolina), Rodney Pitzer (North Carolina), and Steven Winzenburg (Iowa).

8. In sum, ABC potentially could call 38 non-party, fact witnesses with respect to the issues of liability and damages (the 38 count includes 5 members of the Board of Directors, 5 officers, 5 accountants, and 5 parishioners). Of those 38 non-party fact witnesses, 35 (or, 92%) reside and/or work within the Central District of California and all 38 (or, 100%) reside outside of the State of new York.

**The Central District Is More Convenient For Price's Non-Party Witnesses**

9. By Price's representations to the Court, Price's non-party witnesses will, at a minimum, include his daughter, Angela Evans; his son-in-law, A. Michael Evans; his daughter, Cheryl Price; his daughter, Stephanie Buchanan; his son-in-law, Danon Buchanan; his son, Frederick Price, Jr.; and his daughter-in-law, Angel Price. *See* Pl.'s Opp at 12 ("[E]ach of Plaintiff's children, and their spouses, will testify on behalf of Plaintiff in his case in chief . . . ."); *see also* Fink Decl. ¶ 27 Ex. 17 (webpage from CCC.net regarding Dr. Betty Price) (listing all of the aforementioned witnesses as Price's children or in-laws). As demonstrated above, it is highly likely that all of these individuals reside (or work) in Los Angeles County. *See supra* ¶ 6. Accordingly, Price would be hard-pressed to deny that it is more convenient for Price's non-party witnesses if this case is transferred back to the Central District.

**The Central District Can Compel Significantly More Material Non-Party Witnesses To Testify**

10. The witnesses upon whom ABC will rely for its defense of this matter, including its defense of truth<sup>3</sup> and lack of harm to Price, are either (a) parties to this dispute or (b) the non-parties identified above (*e.g.*, Price's relatives; Price's accountant; and Price's church's accountants, officers, board members, and employees). Parties to this dispute can be compelled to testify; non-parties cannot. As set forth above, the majority of ABC's non-party witnesses – at least 35 of 38 witnesses (or, 92%) – reside and/or work in Los Angeles County. *See supra* ¶ 6.

11. The same holds true for Price's witnesses. Price has identified his relatives as material witnesses. *See supra* ¶ 9. In addition, in opposition to ABC's motion to transfer, Price

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<sup>3</sup> Through ABC's communications under the Central District's rules as well as ABC's mediation position, ABC had made clear to Price that it has and will assert "truth" as its primary defense.

submitted declarations from his relatives (and other witnesses), all of which declarations state that they were signed in Los Angeles County. *See* Declarations of B. Buchanan, D. Buchanan, S. Buchanan, Dulay, Cooper, Whitaker, A. Price, F. Price, Jr., C. Price, B. Price, A.M. Evans, and A. Evans.

12. Thus, accounting for any overlap between the witnesses each party will likely call to testify at trial, the Central District can compel substantially more material non-party witnesses to testify live, before the jury, than can the Southern District.

**The Key Evidence Is Within The Central District**

13. This action originated in Los Angeles, California when on July 24, 2007, Price filed his CA Complaint. Since that time, ABC already began litigating this action in California.

14. On or about September 13, 2007, in preparation for the factual investigation and discovery that would ensue in Los Angeles, ABC transferred the original tapes of the “20/20” Report that is the subject of this lawsuit (including Betacam tapes, a VHS tape, digital video tapes, DVDs, and compact discs) to my offices in Los Angeles, where those original tapes remain today. Copies of the original tapes of the “20/20” Report were made in Los Angeles and remain in Los Angeles, although it is possible that additional copies of some of the tapes may also have been sent to New York by counsel for ABC. In addition, on or about July 26, 2007, in connection with ABC’s factual investigation and preparation for discovery in Los Angeles, ABC transferred true and accurate copies of all documents relating to this matter to Los Angeles, where they have remained since that time. The originals of the documents are in New York.

15. Moreover, in order to collect conclusive evidence to prove that the News report was factually accurate and caused Price no harm, ABC will need to investigate Price’s assets and financial records. ABC will need to conduct an audit of Price’s assets and the assets of his

family members – namely, (a) Price’s palatial residence in Palos Verdes Estates<sup>4</sup>; (b) other real estate held in Price’s name; in the name of one of his trusts; in the names of his wife, children and/or other heirs<sup>5</sup>; (c) other real estate devoted to Price’s use but held in the name of Crenshaw-Los Angeles Church); (d) the private Gulfstream jet used exclusively to fly Price around the world; (e) the luxury automobiles owned by Price, his wife, their children and the other Price family members who are on the church payroll; (f) Price’s income that is derived from donations to his Crenshaw-Los Angeles Church; (g) other entities owned, controlled or doing business for the Crenshaw-Los Angeles Church<sup>6</sup>; (h) Price’s income from other sources<sup>7</sup>; and (i) any other indicia of Price’s immense material wealth. In order to disprove Price’s (erroneous) allegation that ABC wrongly accused him of “divert[ing] funds donated to [his Crenshaw-Los Angeles Church] for his own personal use,” CA Compl. ¶ 22; NY Compl. 25, ABC will need to review the financial records of Price’s church, as well as Price’s own financial records.

16. I believe that most if not all of the foregoing evidence for ABC’s defense will be found in or within close proximity of Los Angeles County. *See* Fink Decl. ¶ 30 Ex. 20 (Grant

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<sup>4</sup> Price has not disputed that one of the homes shown in the News Report was of his home in Palos Verdes Estates, an exclusive residential community in southwestern Los Angeles County. Moreover, according to real property tax assessor records, Price is identified as owner of a home in Palos Verdes Estates, California. Fink Decl. ¶ 34 Ex. 24.

<sup>5</sup> Real property records suggest that Price owns and/or has owned other property in Los Angeles County and that he has transferred property to his children. A true and correct copy of those records is attached hereto as Exhibit 2. Moreover, real property records suggest that Price has held property in the name of a trust. Ex. 1; *see also* Fink Decl. ¶ 34 Ex. 24 (referring to “trust” for ownership rights).

<sup>6</sup> For instance, a search for fictitious business names owned by Crenshaw Christian Center revealed the following: Ever Increasing Faith TV, Ever Increasing Faith Ministries, Faith One Adv, Frederick K.C. Apostle of Faith, and Faith One Publishing. A true and correct copy of these search results is attached hereto as Exhibit 3.

<sup>7</sup> For instance, Price is the CEO of another California corporation, the Fellowship of Inner City Word of Faith Ministries (“FICWFM”). *See* Fink Decl. ¶¶ 32-33 Exs. 22-23 (Secretary of State business record re: FICWFM; Executive Affiliation Records for FICWFM).



McLaren, *Matching Mission and Machine*, Professional Pilot Magazine, Nov. 2005, at 91) (stating the private Gulfstream jet used by Price is “based at LGB (Long Beach, CA)”); *id.* ¶¶34-37 Exs. 24-27 (real property tax assessor records for real property owned by Price or his family located in Los Angeles County); *see also supra* ¶¶ 6.

17. With respect to Price’s evidence in support of his claims, most (if not all) of his evidence will be found in California. In particular, any evidence in support of Price’s (erroneous) allegation that the News Report falsely characterized him, his prosperity, and the money he receives from his Crenshaw-Los Angeles Church, would logically be in California, where he alleges he has resided for decades and has spent decades building his reputation. CA Compl. ¶¶ 1, 19. Moreover, Price’s documentary evidence (such as the original Rebuttal Video, along with drafts and outtakes from the production of that rebuttal video) should be in California already since he originally commenced his action in Los Angeles. Price has already retained an expert, Edward Finegan, who is also located in California.

**The Locus Of Operative Facts Is Largely Within The Central District**

18. As an initial matter, while the News Report was produced in New York (*e.g.*, footage was received and compiled in New York), the footage was featured on nationally broadcast programs, not local television in New York. The allegedly misused footage that forms the basis of this lawsuit has nothing to do with New York. The footage features (a) Price, a lifetime resident of California; (b) an image of Price’s California home; and (c) an image of Price preaching before his California congregation. *See* Fink Decl. ¶ 4 Ex. 1 (CD-ROM: News Report Broadcast on “GMA” and “20/20”). Moreover, the footage of Price’s home was taken from a news helicopter operated by ABC’s local affiliated station in Los Angeles, KABC-TV. Thus, the allegedly offending footage features individuals, events, and property relating to California, not New York.



19. More fundamentally, Price's causes of action for defamation and intentional infliction of emotional distress are premised upon allegedly false and harmful statements contained in the News Report. In particular, Price complains that the News Report wrongly accused him of "divert[ing] funds donated to the [Crenshaw-Los Angeles Church] for his own personal use," and that the News Report harmed his standing among the members of his congregation and community, who are located in Los Angeles. CA Compl. ¶¶ 7, 22-23; NY Compl. ¶¶ 8, 25-26. Since Price, his church, and his parishioners are all in Los Angeles county, when Price sought to broadcast his own, professionally produced Rebuttal Video, it appears that he produced the video from the Crenshaw-Los Angeles Church. Indeed, the Video Rebuttal featured interviews with individuals who were identified as parishioners of the Crenshaw-Los Angeles Church. Fink Decl. ¶ 10 Ex. 7 (CD-ROM: Rebuttal Video); *see supra* ¶ 6.

**The Parties' Financial Interests Support Transfer Back To California**

20. Price is a California resident, which makes litigating this dispute in California far more economical than the Southern District. ABC has the means to litigate this action in the Central District and, importantly, in light of the substantial resources ABC has already invested in conducting a factual investigation of this matter in California, and preparing its defense pursuant to the applicable California law, litigation of this dispute in the Central District would be more economical for ABC as well. Moreover, almost all of the parties' key witnesses and evidence are located in California. *See supra* ¶¶ 6, 9, 13-17.

**Price's Forum Shopping Destroys Any Deference Accorded To His "Choice" Of Forum**

21. Price has been and remains a California resident, and the facts and evidence giving rise to this action are predominantly within the Central District. *See supra* ¶¶ 6, 9, 13-17. The procedural history of this action and Price's own arguments to this Court demonstrate that he chose to re-file in the Southern District, rather than the Central District, in an attempt to evade

California law. Fink Decl. ¶¶ 14-16, 25 Ex. 16 at 6:19-25 (Tr. of March 5, 2008 Pre-Motion Conference) (stating that Price sought to avoid a stay of his action, which he believes would result from the denial (and subsequent appeal of the denial) of Defendants' Anti-SLAPP motion in the Central District of California). Indeed, while the action was pending in the Central District and during the parties' unsuccessful mediation, Price was given a preview of the merits of ABC's Anti-SLAPP motion. Fink Decl. ¶¶ 17-18. In an effort to avoid that outcome-dispositive motion, Price has attempted to refile his case in a different jurisdiction.

**Trial Efficiency And The Interest Of Justice Compel Transfer Of This Action**

22. Since this action originated within the Central District of California, and the parties have not commenced formal discovery in this Court, transfer back to the Central District certainly would be efficient and not impede the progress of this action. The totality of circumstances of this particular case compel transfer because, as detailed herein and in ABC's opening and reply briefs, (a) Price is a California resident, (b) most of the witnesses and evidence, including Price's immense collection of material wealth, are located in California; (c) if Price suffered any harm at all from ABC's News Report, that harm was centered in California; (d) the law of California governs this dispute; and (e) not insignificantly, Price originally chose California as the forum for his action.

23. If this action were to proceed in New York, Price will effectively prevent ABC from eliciting live trial testimony from all or almost all of the material witnesses who will disprove Price's allegations. Since these witnesses and the overwhelming majority of witnesses for both parties reside within the Central District, transfer of this action will benefit both parties and save Defendants from undue prejudice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed May 16, 2008, at Los Angeles, California.

  
\_\_\_\_\_  
David E. Fink

# **EXHIBIT 1**

to

**SUPPLEMENTAL DECLARATION OF DAVID E. FINK IN SUPPORT OF  
ABC'S MOTION TO TRANSFER**

**REAL PROPERTY TRANSACTION RECORD**

Filings Collected Through:05-08-2008  
County Last Updated:05-14-2008  
Frequency of Update:WEEKLY  
Current Date:05/15/2008  
Source: COUNTY RECORD- ER , LOS ANGELES, CALIFORNIA

**OWNER INFORMATION**

Owner(s):BUCHANAN DANON R  
Owner Relationship:HUSBAND/WIFE  
Ownership Rights:JOINT TENANTS  
Additional Owner #1:BUCHANAN DANON R & STEPHANIE P  
Owner Relationship:HUSBAND/WIFE  
Owner Rights:JOINT TENANTS  
Property Address:25402 BAYSIDE PL  
HARBOR CITY CA 90710-3071  
Mailing Address:25402 BAYSIDE PL  
HARBOR CITY CA 90710-3071

**PROPERTY INFORMATION**

County:LOS ANGELES  
Property Type:RESIDENTIAL CONDOMINIUM

**TRANSACTION INFORMATION**

Transaction Date:10/22/2003  
Deed Type:DEED OF TRUST  
Type of Transaction:REFINANCE  
Mortgage Amount:\$205,126.00  
Mortgage Type:CONVENTIONAL  
Mortgage Term:30 YEARS  
Mortgage Deed Type:DEED OF TRUST  
Mortgage Date:10/22/2003  
Mortgage Due Date:11/01/2033  
Interest Rate:FIXED  
Lender Name: BANK OF AMERICA  
Lender Address: BREA, CA 92823  
Recording Date:10/28/2003  
Document Number:3223299  
Title Company:FIRST AMERICAN TITLE

Refinance Loan: LOAN TO VALUE IS MORE THAN 50%

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
to order copies of documents related to this or other matters.  
Additional charges apply.

END OF DOCUMENT

## **EXHIBIT 2**

to

SUPPLEMENTAL DECLARATION OF DAVID E. FINK IN SUPPORT OF  
ABC'S MOTION TO TRANSFER

Westlaw.

APN: 7544-023-020

Page 1

**REAL PROPERTY TRANSACTION RECORD**

Filings Collected Through:08-30-2007  
County Last Updated:09-05-2007  
Frequency of Update:WEEKLY  
Current Date:09/05/2007  
Source: COUNTY  
RECORDER

CALIFORNIA , LOS ANGELES,

**OWNER INFORMATION**

Owner(s):PRICE TRUST  
Ownership Rights:PERSONAL TRUST  
Additional Owner #1:PRICE TRUST  
Owner Rights:PERSONAL TRUST  
Property Address:1436 VIA ARCO  
PALOS VERDES ESTATES CA 90274-2055  
Mailing Address:1436 VIA ARCO  
PALOS VERDES ESTATES CA 90274-2055

**PROPERTY INFORMATION**

County:LOS ANGELES  
Assessor's Parcel Number:7544-023-020  
Property Type:SINGLE FAMILY RESIDENCE - TOWNHOUSE  
Land Use:SINGLE FAMILY RESIDENCE  
Building Square Feet:7893

**TRANSACTION INFORMATION**

Transaction Date:07/16/2002  
Seller Name:PRICE FREDERICK K C & BETTY R  
Consideration:UNCERTIFIED  
Deed Type:QUIT CLAIM  
Type of Transaction:NOMINAL  
Recording Date:10/28/2002  
Document Number:2560219  
Title Company:ATTORNEY ONLY  
Construction Type:RESALE  
InterFamily Transaction:YES  
Purchase Payment:CASH

TAX ASSESSOR RECORD is available for this property. The record contains information from the office of the local real property tax assessor office. In addition to identifying the current owner, the record may include tax assessment



APN: 7544-023-020

Page 2

information, the legal description, and property characteristics. Additional charges may apply.

TRANSACTION HISTORY REPORT is available for this property. The report contains details about all available transactions associated with this property. The report may include information about sales, ownership transfers, refinances, construction loans, 2nd mortgages, or equity loans based on recorded deeds. Additional charges may apply.

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
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APN: 4203-026-154

Page 1

**REAL PROPERTY TAX ASSESSOR RECORD**

Tax Roll Certification Date: 06-28-2006  
Owner Information Current Through: 08-16-2007  
County Last Updated: 08-24-2007  
Current Date: 09/05/2007  
Source: TAX  
ASSESSOR

LOS

ANGELES, CALIFORNIA

**OWNER INFORMATION**

Owner(s): PRICE FREDERICK K  
PRICE BETTY R  
Owner Relationship: HUSBAND/WIFE  
Ownership Rights: JOINT TENANCY  
Absentee Owner: YES  
Property Address: 8313 HANNUM AVE  
CULVER CITY, CA 90230-6172  
Mailing Address: 1436 VIA ARCO  
PALOS VERDES ESTATES, CA 90274-2055

**PROPERTY INFORMATION**

County: LOS ANGELES  
Assessor's Parcel Number: 4203-026-154  
Property Type: CONDOMINIUM  
Land Use: CONDOMINIUM  
Zoning: CC-R3  
Lot Size: 3053  
Lot Acreage: 0.0701  
Legal Description: TR=48266 LOT 1 CONDO UNIT 117  
Tract/Subdivision Number: 48266  
Lot Number: 1

**TAX ASSESSMENT INFORMATION**

Tax Year: 2005  
Land Value: \$430,236.00  
Improvement Value: \$212,364.00  
Total Value: \$642,600.00  
Valuation Method: ASSESSED  
Tax Amount: \$6,968.32  
Tax Code Area: 3191

**BUILDING/IMPROVEMENT CHARACTERISTICS**

APN:4203-026-154

Page 2

Number of Buildings: 1  
Year Built: 1996  
Living Square Feet: 2018  
Number of Bedrooms: 3  
Number of Bathrooms: 3.00  
Full Baths: 3  
Number of Units: 1

**LAST FULL MARKET SALE INFORMATION**

Sale Date: 06/17/2004  
Seller Name: GARAY LETICIA  
Sale Price: \$630,000.00  
Consideration: FULL  
Deed Type: GRANT DEED  
Type of Sale: RESALE  
Mortgage Amount: \$400,000.00  
Mortgage Type: CONVENTIONAL  
Mortgage Term: 30 YEARS  
Lender Name: WELLS FARGO BK  
Recording Date: 07/29/2004  
Document Number: 1945561  
Title Company: FIDELITY TITLE

**PREVIOUS TRANSACTION INFORMATION**

Sale Price: \$250,500.00  
Consideration: FULL  
Mortgage Amount: \$220,500.00  
Recording Date: 02/21/1997

TRANSACTION HISTORY REPORT is available for this property. The report contains details about all available transactions associated with this property. The report may include information about sales, ownership transfers, refinances, construction loans, 2nd mortgages, or equity loans based on recorded deeds. Additional charges may apply.

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
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APN: 4201027029

Page 1

**REAL PROPERTY TRANSACTION RECORD**

Filings Collected Through:08-30-2007  
County Last Updated:09-05-2007  
Frequency of Update:WEEKLY  
Current Date:09/05/2007  
Source: COUNTY  
RECORDER

, LOS ANGELES,  
CALIFORNIA

**OWNER INFORMATION**

Owner(s):MICHAEL EVANS A  
Property Address:5240 SENFORD AVE  
LOS ANGELES CA 90056-1025  
Mailing Address:5240 SENFORD AVE  
LOS ANGELES CA 90056-1025

**PROPERTY INFORMATION**

County:LOS ANGELES  
Assessor's Parcel Number:4201027029  
Property Type:SINGLE FAMILY RESIDENCE - TOWNHOUSE  
Building Square Feet:5098

**TRANSACTION INFORMATION**

Transaction Date:08/1989  
Seller Name:PRICE FREDERICK K C  
Sale Price:\$780,000.00  
Deed Type:GRANT DEED  
Type of Transaction:RESALE  
Mortgage Amount:\$585,000.00  
Mortgage Type:PRIVATE PARTY LENDER  
Recording Date:09/22/1989  
Document Number:1536022  
Private Party Lender:YES  
Construction Type:RESALE  
Purchase Payment:MORTGAGE

TAX ASSESSOR RECORD is available for this property. The record contains information from the office of the local real property tax assessor office. In addition to identifying the current owner, the record may include tax assessment information, the legal description, and property characteristics. Additional charges may apply.

APN: 4201027029

Page 2

TRANSACTION HISTORY REPORT is available for this property. The report contains details about all available transactions associated with this property. The report may include information about sales, ownership transfers, refinances, construction loans, 2nd mortgages, or equity loans based on recorded deeds. Additional charges may apply.

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to order copies of documents related to this or other matters.  
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APN:4201-027-029

Page 1

**REAL PROPERTY TAX ASSESSOR RECORD**

Tax Roll Certification Date:06-28-2006  
Owner Information Current Through:08-16-2007  
County Last Updated:08-24-2007  
Current Date:09/05/2007  
Source: TAX  
ASSESSOR

LOS

ANGELES, CALIFORNIA

**OWNER INFORMATION**

Owner(s): EVANS ANGELA M  
EVANS A MICHAEL JR  
Owner Relationship: HUSBAND/WIFE  
Property Address: 5240 SENFORD AVE  
LOS ANGELES, CA 90056-1025  
Mailing Address: 5240 SENFORD AVE  
LOS ANGELES, CA 90056-1025  
Phone: 310-910-2833

**PROPERTY INFORMATION**

County: LOS ANGELES  
Assessor's Parcel Number: 4201-027-029  
Property Type: SINGLE FAMILY RESIDENCE - TOWNHOUSE  
Land Use: SINGLE FAMILY RESIDENCE  
Zoning: LCRLYY  
Lot Size: 8756  
Lot Acreage: 0.2010  
Width Footage: 71  
Depth Footage: 124  
Legal Description: TRACT # 18066 LOT 124  
Tract/Subdivision Number: 18066  
Lot Number: 124

**TAX ASSESSMENT INFORMATION**

Tax Year: 2005  
Land Value: \$54,250.00  
Improvement Value: \$436,674.00  
Total Value: \$490,924.00  
Valuation Method: ASSESSED  
Tax Amount: \$6,081.88  
Tax Code Area: 4623

**BUILDING/IMPROVEMENT CHARACTERISTICS**

Number of Buildings: 1  
Year Built: 1965  
Living Square Feet: 5098  
Total Number of Rooms: 11  
Number of Bedrooms: 6  
Number of Bathrooms: 4.00  
Full Baths: 4  
Fireplace: YES  
Garage Type: ATTACHED  
Parking Spaces: 2  
Pool: Y  
Pool Type: TYPE UNKNOWN  
Number of Stories: 200  
Number of Units: 1  
Style/Shape: CON  
Exterior Wall Type: STUCCO  
Roof Type: GABLE  
Foundation Type: RAISED  
Heat: CLO  
Water: PUBLIC  
Sewer: TYPE UNKNOWN  
A/C Type: AC CENTRAL

**LAST FULL MARKET SALE INFORMATION**

Sale Date: 08/1989  
Seller Name: PRICE FREDERICK K C  
Sale Price: \$780,000.00  
Consideration: FULL  
Deed Type: GRANT DEED  
Type of Sale: RESALE  
Mortgage Amount: \$585,000.00  
Mortgage Type: CONVENTIONAL  
Lender Name: SECURITY PACIFIC NAT'L BK  
Recording Date: 09/22/1989  
Document Number: 1536022  
Title Company: LINCOLN TITLE CO.

TRANSACTION HISTORY REPORT is available for this property. The report contains details about all available transactions associated with this property. The report may include information about sales, ownership transfers, refinances, construction loans, 2nd mortgages, or equity loans based on recorded deeds. Additional charges may apply.

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APN: 4201027028

Page 1

**REAL PROPERTY TRANSACTION RECORD**

Filings Collected Through:08-30-2007  
County Last Updated:09-05-2007  
Frequency of Update:WEEKLY  
Current Date:09/05/2007  
Source: COUNTY  
RECORDER

, LOS ANGELES,  
CALIFORNIA

**OWNER INFORMATION**

Owner(s):CRABBE ALLEN  
Property Address:5304 SENFORD AVE  
LOS ANGELES CA 90056-1027  
Mailing Address:LOS ANGELES CA 90056

**PROPERTY INFORMATION**

County:LOS ANGELES  
Assessor's Parcel Number:4201027028  
Property Type:SINGLE FAMILY RESIDENCE - TOWNHOUSE  
Building Square Feet:2318

**TRANSACTION INFORMATION**

Transaction Date:02/1987  
Seller Name:PRICE FREDERICK K C  
Deed Type:QUIT CLAIM  
Type of Transaction:NOMINAL  
Recording Date:03/02/1987  
Document Number:311308  
Construction Type:RESALE  
Purchase Payment:CASH

TAX ASSESSOR RECORD is available for this property. The record contains information from the office of the local real property tax assessor office. In addition to identifying the current owner, the record may include tax assessment information, the legal description, and property characteristics. Additional charges may apply.

TRANSACTION HISTORY REPORT is available for this property. The report contains details about all available transactions associated with this property. The report may include information about sales, ownership transfers, refinances, construction loans, 2nd mortgages, or equity loans based on recorded deeds. Additional charges may apply.



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## **EXHIBIT 3**

to

**SUPPLEMENTAL DECLARATION OF DAVID E. FINK IN SUPPORT OF  
ABC'S MOTION TO TRANSFER**

Westlaw.

Document Number: 311308

Page 1

**REAL PROPERTY TRANSACTION RECORD**

Filings Collected Through:08-30-2007  
County Last Updated:09-05-2007  
Frequency of Update:WEEKLY  
Current Date:09/05/2007  
Source: COUNTY  
RECORDER

, LOS ANGELES,  
CALIFORNIA

**OWNER INFORMATION**

Owner(s):CRABBE ALLEN AND WIFE  
Owner Relationship:HUSBAND/WIFE  
Property Address:CA  
Mailing Address:5304 SENFORD AVE  
LOS ANGELES CA 90056-1027

**PROPERTY INFORMATION**

County:LOS ANGELES  
Property Type:MISCELLANEOUS

**TRANSACTION INFORMATION**

Seller Name:PRICE FREDERICK  
Consideration:SALE PRICE (FULL)  
Type of Transaction:RESALE  
Recording Date:03/02/1987  
Document Number:311308  
Construction Type:RESALE  
Purchase Payment:CASH

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Additional charges apply.

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APN: 4201027029

Page 1

**REAL PROPERTY TRANSACTION RECORD**

Filings Collected Through:08-30-2007  
County Last Updated:09-05-2007  
Frequency of Update:WEEKLY  
Current Date:09/05/2007  
Source: COUNTY  
RECORDER

, LOS ANGELES,  
CALIFORNIA

**OWNER INFORMATION**

Owner(s):PRICE FREDERICK AND WIFE  
Owner Relationship:HUSBAND/WIFE  
Property Address:5240 SENFORD AVE  
LOS ANGELES CA 90056-1025  
Mailing Address:5240 SENFORD AVE  
LOS ANGELES CA 90056-1025

**PROPERTY INFORMATION**

County:LOS ANGELES  
Assessor's Parcel Number:4201027029  
Property Type:SINGLE FAMILY RESIDENCE - TOWNHOUSE  
Building Square Feet:5098

**TRANSACTION INFORMATION**

Type of Transaction:REFINANCE  
Mortgage Amount:\$624,000.00  
Mortgage Type:CONVENTIONAL  
Lender Name: SECURITY PACIFIC NAT'L BK  
Lender Address: LOS ANGELES 90056  
Recording Date:06/30/1989  
Document Number:1046819  
Refinance Loan:YES

TAX ASSESSOR RECORD is available for this property. The record contains information from the office of the local real property tax assessor office. In addition to identifying the current owner, the record may include tax assessment information, the legal description, and property characteristics. Additional charges may apply.

TRANSACTION HISTORY REPORT is available for this property. The report contains details about all available transactions associated with this property. The report may include information about sales, ownership transfers, refinances, construction

loans, 2nd mortgages, or equity loans based on recorded deeds. Additional charges may apply.

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Additional charges apply.

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APN: 4201027028

Page 1

**REAL PROPERTY TRANSACTION RECORD**

Filings Collected Through:08-30-2007  
County Last Updated:09-05-2007  
Frequency of Update:WEEKLY  
Current Date:09/05/2007  
Source: COUNTY  
RECORDER

CALIFORNIA , LOS ANGELES,

**OWNER INFORMATION**

Owner(s):PRICE FREDERICK K C  
Property Address:5304 SENFORD AVE  
LOS ANGELES CA 90056-1027  
Mailing Address:5240 SENFORD AVE  
LOS ANGELES CA 90056-1025

**PROPERTY INFORMATION**

County:LOS ANGELES  
Assessor's Parcel Number:4201027028  
Property Type:SINGLE FAMILY RESIDENCE - TOWNHOUSE  
Building Square Feet:2318

**TRANSACTION INFORMATION**

Transaction Date:08/1985  
Seller Name:NAKAWATASE KIYE  
Sale Price:\$220,000.00  
Deed Type:GRANT DEED  
Type of Transaction:RESALE  
Mortgage Amount:\$176,000.00  
Mortgage Type:PRIVATE PARTY LENDER  
Recording Date:08/22/1985  
Document Number:973772  
Private Party Lender:YES  
Construction Type:RESALE  
Purchase Payment:MORTGAGE

TAX ASSESSOR RECORD is available for this property. The record contains information from the office of the local real property tax assessor office. In addition to identifying the current owner, the record may include tax assessment information, the legal description, and property characteristics. Additional charges may apply.

APN: 4201027028

Page 2

TRANSACTION HISTORY REPORT is available for this property. The report contains details about all available transactions associated with this property. The report may include information about sales, ownership transfers, refinances, construction loans, 2nd mortgages, or equity loans based on recorded deeds. Additional charges may apply.

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to order copies of documents related to this or other matters.  
Additional charges apply.

END OF DOCUMENT

Westlaw.

**FICTITIOUS BUSINESS NAME RECORD**

Information Current Through:07-31-2007  
Database Last Updated:10-23-2007  
Update Frequency:MONTHLY  
Current Date:10/25/2007  
Source:LOS ANGELES County, CA

**BUSINESS INFORMATION**

Name:DR. FREDERICK K.C. APOSTLE OF FAITH  
Address:7901 S VERMONT AVE  
LOS ANGELES, CA 90044  
County:LOS ANGELES

**FILING INFORMATION**

Filing Date:01/25/2007  
Identification Number:07-0159393  
Business Type:CORPORATION

**OWNER INFORMATION**

Name:CRENSHAW CHRISTIAN CENTER  
Address:7901 S VERMONT AVE LOS ANGELES CA  
90044

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
to order copies of documents related to this or other matters.  
Additional charges apply.

END OF DOCUMENT



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**EXECUTIVE AFFILIATION RECORD**

Information Current Through: 07-31-2007  
Database Last Updated: 10-23-2007  
Update Frequency: MONTHLY  
Current Date: 10/25/2007  
Source: LOS ANGELES COUNTY, CA

**EXECUTIVE INFORMATION**

Executive Name: CRENSHAW CHRISTIAN CENTER  
Executive Address: 7901 S VERMONT AVE LOS ANGELES CA 90044

**BUSINESS INFORMATION**

Business Name: DR. FREDERICK K.C. APOSTLE OF FAITH  
Business Address: 7901 S VERMONT AVE  
LOS ANGELES, CA 90044

**OTHER INFORMATION**

Filing Date: 01/25/2007  
Business/Filing Type: CORPORATION  
Indentification No.: 07-0159393  
Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
to order copies of documents related to this or other matters.  
Additional charges apply.

THE PRECEDING PUBLIC RECORD DATA IS FOR INFORMATION PURPOSES ONLY AND IS NOT THE  
OFFICIAL RECORD. CERTIFIED COPIES CAN ONLY BE OBTAINED FROM THE OFFICIAL SOURCE.

END OF DOCUMENT

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**FICTITIOUS BUSINESS NAME RECORD**

Information Current Through:07-31-2007  
Database Last Updated:10-23-2007  
Update Frequency:MONTHLY  
Current Date:10/25/2007  
Source:LOS ANGELES County, CA

**BUSINESS INFORMATION**

Name:FAITH ONE ADV  
Address:7901 S VERMONT AVE  
CA 90044  
County:LOS ANGELES

**FILING INFORMATION**

Filing Date:03/23/1992  
Identification Number:92-125941  
Business Type:BLANK OR UNKNOWN

**OWNER INFORMATION**

Name:CRENSHAW CHRISTIAN CTR ETC

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
to order copies of documents related to this or other matters.  
Additional charges apply.

END OF DOCUMENT

Westlaw.

**EXECUTIVE AFFILIATION RECORD**

Information Current Through:

07-31-2007	Database Last Updated:
10-23-2007	Update Frequency:
MONTHLY	Current Date:
10/25/2007	Source:
LOS ANGELES COUNTY, CA	Executive Name:
CRENSHAW CHRISTIAN CTR ETC	Business Name:
FAITH ONE ADV	Business Address:
7901 S VERMONT AVE	
CA 90044	Filing Date:
03/23/1992	Business/Filing Type:
BLANK OR UNKNOWN	Indentification No.:
92-125941	

Westlaw.

**FICTITIOUS BUSINESS NAME RECORD**

Information Current Through:07-31-2007  
Database Last Updated:10-23-2007  
Update Frequency:MONTHLY  
Current Date:10/25/2007  
Source:LOS ANGELES County, CA

**BUSINESS INFORMATION**

Name:EVER INCREASING FAITH T V  
Address:7901 S VERMONT AVE  
LOS ANGELES, CA 90044  
County:LOS ANGELES

**FILING INFORMATION**

Filing Date:05/17/2005  
Identification Number:05-1161236  
Business Type:CORPORATION

**OWNER INFORMATION**

Name:CRENSHAW CHRISTIAN CENTER  
Address:7901 S VERMONT AVE LOS ANGELES CA  
90044

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
to order copies of documents related to this or other matters.  
Additional charges apply.

END OF DOCUMENT

Westlaw.

**EXECUTIVE AFFILIATION RECORD**

Information Current Through: 07-31-2007  
Database Last Updated: 10-23-2007  
Update Frequency: MONTHLY  
Current Date: 10/25/2007  
Source: LOS ANGELES COUNTY, CA

**EXECUTIVE INFORMATION**

Executive Name: CRENSHAW CHRISTIAN CENTER  
Executive Address: 7901 S VERMONT AVE LOS ANGELES CA 90044

**BUSINESS INFORMATION**

Business Name: EVER INCREASING FAITH T V  
Business Address: 7901 S VERMONT AVE  
LOS ANGELES, CA 90044

**OTHER INFORMATION**

Filing Date: 05/17/2005  
Business/Filing Type: CORPORATION  
Indentification No.: 05-1161236  
Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
to order copies of documents related to this or other matters.  
Additional charges apply.

THE PRECEDING PUBLIC RECORD DATA IS FOR INFORMATION PURPOSES ONLY AND IS NOT THE  
OFFICIAL RECORD. CERTIFIED COPIES CAN ONLY BE OBTAINED FROM THE OFFICIAL SOURCE.

END OF DOCUMENT

Westlaw.

**FICTITIOUS BUSINESS NAME RECORD**

Information Current Through:07-31-2007  
Database Last Updated:10-23-2007  
Update Frequency:MONTHLY  
Current Date:10/25/2007  
Source:LOS ANGELES County, CA

**BUSINESS INFORMATION**

Name:EVER INCREASING FAITH MINISTRIES  
Address:7901 S VERMONT AVE  
CA 90044  
County:LOS ANGELES

**FILING INFORMATION**

Filing Date:03/23/1992  
Identification Number:92-125942  
Business Type:BLANK OR UNKNOWN

**OWNER INFORMATION**

Name:CRENSHAW CHRISTIAN CTR ETC

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
to order copies of documents related to this or other matters.  
Additional charges apply.

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**EXECUTIVE AFFILIATION RECORD**

Information Current Through: 07-31-2007  
Database Last Updated: 10-23-2007  
Update Frequency: MONTHLY  
Current Date: 10/25/2007  
Source: LOS ANGELES COUNTY, CA

**EXECUTIVE INFORMATION**

Executive Name: CRENSHAW CHRISTIAN CTR ETC

**BUSINESS INFORMATION**

Business Name: EVER INCREASING FAITH MINISTRIES  
Business Address: 7901 S VERMONT AVE  
CA 90044

**OTHER INFORMATION**

Filing Date: 03/23/1992  
Business/Filing Type: BLANK OR UNKNOWN  
Indentification No.: 92-125942  
Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
to order copies of documents related to this or other matters.  
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Westlaw.

**FICTITIOUS BUSINESS NAME RECORD**

Information Current Through:07-31-2007  
Database Last Updated:10-23-2007  
Update Frequency:MONTHLY  
Current Date:10/25/2007  
Source:LOS ANGELES County, CA

**BUSINESS INFORMATION**

Name:FAITH ONE PUBLISHING  
Address:7901 S VERMONT AVE  
LOS ANGELES, CA 90044  
County:LOS ANGELES

**FILING INFORMATION**

Filing Date:10/13/1993  
Identification Number:93-1996946  
Business Type:CORPORATION

**OWNER INFORMATION**

Name:CRENSHAW CHRISTIAN CTR4L A  
Address:7901 S VERMONT AVE LOS ANGELES CA  
90044.

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
to order copies of documents related to this or other matters.  
Additional charges apply.

END OF DOCUMENT



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**EXECUTIVE AFFILIATION RECORD**

Information Current Through:

07-31-2007

10-23-2007

MONTHLY

10/25/2007

LOS ANGELES COUNTY, CA

CRENSHAW CHRISTIAN CTRL A

7901 S VERMONT AVE LOS

ANGELES CA 90044

FAITH ONE PUBLISHING

7901 S VERMONT AVE

LOS ANGELES, CA 90044

10/13/1993

CORPORATION

93-1996946

Database Last Updated:

Update Frequency:

Current Date:

Source:

Executive Name:

Executive Address:

Business Name:

Business Address:

Filing Date:

Business/Filing Type:

Identification No.: